

**SSUNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AMERICAN BROADCASTING
COMPANIES, INC., DISNEY
ENTERPRISES, INC., TWENTIETH
CENTURY FOX FILM CORPORATION,
CBS BROADCASTING INC., CBS STUDIOS
INC., FOX TELEVISION STATIONS, LLC,
FOX BROADCASTING COMPANY, LLC,
NBCUNIVERSAL MEDIA, LLC,
UNIVERSAL TELEVISION LLC, and OPEN
4 BUSINESS PRODUCTIONS, LLC,

Plaintiffs,

v.

DAVID R. GOODFRIEND and SPORTS
FANS COALITION NY, INC.,

Defendants.

No. 19-cv-7136

**SECOND JOINT STIPULATION AND [PROPOSED] ORDER
MODIFYING CASE SCHEDULING ORDER**

Plaintiffs, American Broadcasting Companies, Inc., Disney Enterprises, Inc., Twentieth Century Fox Film Corporation, CBS Broadcasting Inc., CBS Studios Inc., Fox Television Stations, LLC, Fox Broadcasting Company, LLC, NBCUniversal Media, LLC, Universal Television LLC, and Open 4 Business Productions, LLC (“Plaintiffs”), and Defendants, David R. Goodfriend and Sports Fans Coalition NY, Inc. (“Defendants”), by and through their counsel, respectfully submit this Second Joint Stipulation and Proposed Order Modifying the Scheduling Order in the above-captioned matter.

On January 31, 2020, this Court entered an initial Scheduling Order with deadlines set through the close of expert discovery on September 11, 2020. The Court also scheduled a status conference for June 19, 2020 to assess the progress of the case and set the remaining case

schedule. At the parties' joint request, this Court on May 12, 2020 entered an Order modifying the case schedule by extending the existing deadlines by eight weeks.

The parties now request a second eight-week extension of the deadlines set forth below (and nine weeks in one instance in light of the Christmas/New Year holiday) because of the continuing impact of the disruptions caused by the COVID-19 health crisis, including local government restrictions on out-of-home business activities. Counsel for the parties have conferred about the effect of these circumstances upon the case's schedule. This is the second time the parties have sought an extension or modification to the case schedule.

IT IS HEREBY STIPULATED AND AGREED, subject to the Court's approval, that the following deadlines are extended pursuant to the table below:

Event	Current Deadline	New Deadline
Status conference	Friday, June 19 (removed from calendar)	Friday, October 9
Fact discovery completed	Friday, August 14	Friday, October 9
Burden-of-proof expert reports	Friday, September 11	Friday, November 6
Rebuttal expert reports	Friday, October 9	Friday, December 4
Expert discovery completed	Friday, November 6	Friday, January 8

Dated: July 6, 2020

Respectfully submitted,

/s/ Elizabeth E. Brenckman

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On this ____ day of July, 2020,

Approved By:

The Honorable Louis L. Stanton
United States District Judge